

Exhibit A-1

From: Andrapalliyal, Vinita B. (CIV) <Vinita.B.Andrapalliyal@usdoj.gov>
Sent: Friday, March 28, 2025 3:55 PM
To: jblock@aclu.org; Omar Gonzalez-Pagan; Daniel, Christian S. (CIV); Stetson, Catherine E.; Edelstein, Laurie J.; Karen Loewy; Chase Strangio; Harper Seldin
Subject: RE: PFLAG v. Trump, 8:25-cv-337

Thanks, Josh. Our answers to your questions below. Let us know if you have further questions or want to discuss anything further.

Have a nice weekend,
Vinita

From: Joshua Block - he/him/his <jblock@aclu.org>
Sent: Wednesday, March 26, 2025 5:07 PM
To: Andrapalliyal, Vinita B. (CIV) <Vinita.B.Andrapalliyal@usdoj.gov>; Omar Gonzalez-Pagan <ogonzalez-pagan@lambdalegal.org>; Daniel, Christian S. (CIV) <Christian.S.Daniel@usdoj.gov>; Stetson, Catherine E. <cate.stetson@hoganlovells.com>; Edelstein, Laurie J. <LEdelstein@jenner.com>; Karen Loewy <kloewy@lambdalegal.org>; Chase Strangio <cstrangio@aclu.org>; Harper Seldin <hseldin@aclu.org>
Subject: [EXTERNAL] Re: PFLAG v. Trump, 8:25-cv-337

Vinita,

Thanks for your message. We have a few questions about the scope of your proposal.

1. Do you intend to seek a stay pending appeal for the district court's preliminary injunction or the motion to enforce (if the court grants the motion to enforce)? If so, we cannot agree to a stay of proceedings before that motion for a stay pending appeal is resolved.

We understand that DOJ is not planning to seek a stay of the PI as things currently stand, but we'd reserve the right to seek a stay depending on any subsequent orders. As we initially stated, we are not seeking a stay of proceedings on the pending motion to enforce.

2. If the government does not intend to seek a stay pending appeal, we would be willing to consider staying the deadline for the government to respond to the amended complaint, but if the government takes further action to enforce the executive orders and those actions are deemed not to fall within the scope of the existing preliminary injunction, we would want to preserve our ability to add new claims to the complaint and seek additional injunctive relief. Does the government envision that its proposal for a stay would preclude us from doing so?

No, we do not. We note, however, that plaintiffs would need to seek defendants' written consent or the court's leave under Federal Rule of Civil Procedure 15(a)(2) before amending their complaint.

3. When you propose that the parties file a JSR within 14 days of the resolution of the government's appeal, does that refer to the date of the panel decision, the issuance of the mandate, the resolution of a petition for certiorari, or something else? In the event that the government succeeds on appeal, we would want to preserve the ability to seek additional relief on alternate grounds before the preliminary injunction is dissolved. To allow for that flexibility, we would propose that the parties file a JSR within 7 days of the panel decision.

We can agree to this.



Thanks again.

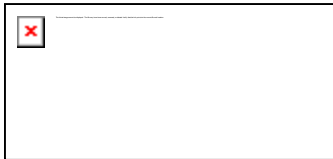
Josh

Joshua Block

Pronouns: he, him

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From: Andrapalliyal, Vinita B. (CIV) <Vinita.B.Andrapalliyal@usdoj.gov>

Sent: Wednesday, March 26, 2025 9:52 AM

To: Omar Gonzalez-Pagan <ogonzalez-pagan@lambdalegal.org>; Daniel, Christian S. (CIV) <Christian.S.Daniel@usdoj.gov>; Joshua Block - he/him/his <jblock@aclu.org>; Stetson, Catherine E. <cate.stetson@hoganlovells.com>; Edelstein, Laurie J. <LEdelstein@jenner.com>; Karen Loewy <kloewy@lambdalegal.org>; Chase Strangio <cstrangio@aclu.org>; Harper Seldin <hseldin@aclu.org>

Subject: PFLAG v. Trump, 8:25-cv-337

Dear counsel,

I hope this email finds you well. In light of Defendants' interlocutory appeal of the court's preliminary injunction, Defendants intend to move to stay district-court proceedings in this case pending resolution of Defendants' appeal. (We do not propose to stay any ancillary proceedings related to compliance with the preliminary injunctions, including Plaintiffs' pending enforcement motion.) Defendants' appeal implicates legal issues that will materially bear on the merits, so a stay would promote judicial economy and conserve the parties' resources. We propose that the parties file a JSR within 14 days of the resolution of Defendants' appeal to propose next steps in the case.

Please provide us with your position on our motion by noon tomorrow, if possible.

Thank you,
Vinita

Vinita Andrapalliyal

Senior Counsel
U.S. Department of Justice
Civil Division, Federal Programs Branch
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